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November 22, 2024

VIA ELECTRONIC CASE FILING

Magistrate Judge Michael A. Hammer U.S. District Court for the District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07101

> In re American Medical Collection Agency, Inc., Customer Data Security Breach Re: Litigation, Case No. 2:19-md-02904-MCA-MHA (District of New Jersey)

Dear Magistrate Judge Hammer:

We represent Quest Diagnostics Incorporated in the above-captioned proceeding. We write on behalf of all Defendants to respectfully request a three-week extension of all upcoming deadlines pertaining to the service and filing of documents relating to Plaintiffs' motion for class certification, including those set out in ECF Nos. 731 and 736. Plaintiffs do not oppose this request.

Plaintiffs served their Motions for Class Certification and supporting expert reports on Defendants on November 1, 2024. A number of questions and disputes arose between the Parties pertaining to those materials and the Parties met and conferred extensively in the three weeks following service. Those conferences were productive, and the Parties agree that it is appropriate to extend all class certification deadlines to account for the time required to reach such resolution.

Enclosed please find a proposed amended scheduling order that has been agreed to by all parties that Defendants respectfully request that the Court enter.

We thank the Court for its attention to this matter.

Respectfully submitted,

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Attorneys for Defendants Quest Diagnostics Incorporated and Quest Diagnostics Clinical Laboratories

cc: All counsel of record (via ECF)